

# **EXHIBIT 6**

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No. 17-md-2804

Judge Dan Aaron

This document relates to: Polster

The County of Cuyahoga v. Purdue  
Pharma L.P., et al.

Case No. 18-OP-45090

City of Cleveland, Ohio v. Purdue  
Pharma L.P., et al

Case No. 18-OP-45132

The County of Summit, Ohio, et al.  
v. Purdue Pharma L.P., et al.

Case No. 17-OP-45004

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Volume II  
Continued deposition of  
LORI BAKER-STELLA

May 23, 2019

10:40 a.m.

Taken at:  
Ulmer & Berne  
1660 W. 2nd Street, Suite 1100  
Cleveland, Ohio

Renee L. Pellegrino, RPR, CLR

1 to do?

2 MR. BENNETT: Objection. Vague.

3 You can answer.

4 A. It's not difficult to do, but we  
5 have special investigative tools of how to get  
6 that information.

7 Q. And those tools, without getting  
8 into what they are, apparently they take a while  
9 to implement and apply and think about and  
10 figure out whether they're giving you the  
11 conclusion it's medical judgment versus  
12 non-medical judgment?

13 MR. BENNETT: Objection. Form.

14 You can answer.

15 A. Yes.

16 Q. And at some level it requires the  
17 input of a medical expert?

18 MR. LEDLIE: Object to the form.

19 MR. BENNETT: Objection. Scope.

20 You can answer.

21 A. Yes.

22 Q. Have you worked on investigations at  
23 TDS that are outside the state of Ohio?

24 MR. BENNETT: Objection. Scope.

25 You can answer that question yes or

1 no only.

2 A. Yes.

3 Q. How frequently does that occur?

4 MR. BENNETT: You can answer that.

5 A. Recently it's been just within, but,  
6 you know, we have had it happen but not anything  
7 like most recent.

8 Q. So like today the cases you're  
9 working on are all within Ohio?

10 MR. BENNETT: Objection. Scope.

11 If you can answer that question yes  
12 or no only. And, also, objection, vague.

13 A. As I say, we have a lot of cases, so  
14 I'm trying to -- I'm trying to think. I think  
15 there's a few still outside.

16 Q. Have you ever concluded that a  
17 doctor was overprescribing based solely on  
18 looking at how many prescriptions the doctor was  
19 writing?

20 MR. BENNETT: Objection. Scope.

21 You can answer that question.

22 THE WITNESS: We might get into  
23 technique.

24 MR. BENNETT: You can answer that  
25 question yes or no only. You are authorized to

1     answer that question yes or no only if you can.

2             A.       That is a tool that we use. That's  
3     only one -- that's not one thing that I would  
4     just focus in and say we're taking him.

5             Q.       And my question is, the number of  
6     prescriptions alone isn't sufficient to reach a  
7     judgment about whether there's overprescribing  
8     or not?

9                     MR. LEDLIE: Object to the form.

10            Q.       Do you agree with that?

11                     MR. BENNETT: Objection. Scope.  
12     You can answer yes or no only.

13            A.       Yes.

14            Q.       Have you ever requested a search  
15     warrant for a doctor based solely on the amount  
16     of prescriptions that the doctor was writing?

17                     MR. BENNETT: You can answer that  
18     question.

19            A.       I don't believe I have.

20                     -     -     -     -     -

21                     (Thereupon, Baker-Stella Deposition  
22     Exhibit 7, E-Mail String Dated  
23     December 9, 2016 Bates Numbered  
24     SUMMIT\_001233825, was marked for  
25     purposes of identification.)

1                                   -   -   -   -   -

2                   Q.       Detective Baker-Stella, Exhibit 7 is  
3   an e-mail from you to Joseph Black dated  
4   December 9th, 2016. It bears the Bates label  
5   SUMMIT\_001233825.

6                               Have you seen this before?

7                   A.       I remember this e-mail.

8                   Q.       Who is Joseph Black? Who's Joe  
9   Black?

10                  A.       Joe Black is a deputy assigned to  
11   our patrol division.

12                  Q.       When you say "our patrol division"  
13   --

14                  A.       Summit County Sheriff's Office  
15   patrol division.

16                  Q.       And in the first sentence he says  
17   he -- of his e-mail to you, he says, "I have a  
18   script case that started as an identity theft  
19   case sent back to me to handle from DB."

20                            Do you know what DB stands for?

21                  A.       Yes. That is our detective bureau.

22                  Q.       And do you know whether this case  
23   resulted in a conviction?

24                  A.       Yes, it did.

25                  Q.       And who was the person that was